

# EXHIBIT I

Declaration of Omar Gonzalez-Pagan in support of  
Motion to Exclude Expert Testimony of Dr. Paul W. Hruz  
*Kadel v. Folwell*, No. 1:19-cv-00272-LCB-LPA (M.D.N.C.)

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

DREW ADAMS, et al.,

*Plaintiff,*

v.

THE SCHOOL BOARD OF ST. JOHNS  
COUNTY, FLORIDA,

*Defendant.*

**No. 3:17-cv-00739-TJC-JBT**

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**DECLARATION OF DR. NORMAN P. SPACK, M.D.**

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I, Norman P. Spack, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of eighteen and submit this declaration based on my personal knowledge.
2. If called to testify, I would testify truthfully based on my own experience and knowledge regarding the matters discussed herein.
3. I am a pediatric endocrinologist. I began practicing pediatric endocrinology in 1976 at Boston Children's Hospital. I have an undergraduate degree from Williams College, a medical degree from the University of Rochester, and completed my pediatrics residency and fellowship in Pediatric Endocrinology and Adolescent Medicine at Boston Children's Hospital.

**Exhibit  
0019  
9/29/2021  
Hruz**

4. I am an Associate Physician in Medicine at Boston Children's Hospital, the Co-Founder and Co-Director *Emeritus* of the Gender Management Service (GeMS) Program at Boston Children's Hospital, and an Associate Clinical Professor of Pediatrics at Harvard Medical School in Massachusetts.

5. In 2007, I co-founded the GeMS Program at Boston Children's Hospital. The first-of-its-kind program in the United States, GeMS provides comprehensive care to the unique group of gender nonconforming and transgender children and adolescents. The GeMS team consists of providers from Endocrinology, Psychology, and Social Work, and works closely with specialists in other departments in the hospital such as Adolescent Medicine, Urology, and Plastic Surgery to develop individual care plans that meet every child's medical and emotional needs, as well as the family's need for information and support.

6. Since its founding, the GeMS Program has been replicated by over 60 similar programs at pediatric academic centers in North America, including the now Transgender Center at St. Louis Children's Hospital.

7. In 2012, I was awarded a Bicentennial Medal by Williams College in recognition for distinguished achievement in the field of pediatric endocrinology and for helping reduce the suicide rate among transgender adolescents through my work with GeMS.

8. On or about October 9, 2013, I gave a presentation at St. Louis Children's Hospital regarding the founding of GeMS, the workings of a gender management program at pediatric hospital, and the medical treatment and care of gender nonconforming and transgender children and adolescents.

9. Following my presentation, I privately met with medical staff, including endocrinologists, at St. Louis Children's Hospital to answer their questions and share my knowledge and experience.

10. It was in the aforementioned context that I also met privately with Dr. Paul W. Hruz at St. Louis Children's Hospital when he approached me after my presentation.

11. During my private meeting with Dr. Hruz, Dr. Hruz directly expressed that he had "a significant problem with the entire issue" and "whole idea of transgender."

12. Dr. Hruz followed up his comments by stating, "For me, it is a matter of my faith."

13. During our conversation, Dr. Hruz did not discuss or mention that his issues or concerns were based on science.

14. In my experience, someone who acts out of science would go and see how gender management clinics work in order to form their opinions.

This declaration was executed on this \_\_\_\_ day of December, 2017 in Boston, Massachusetts.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

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Norman P. Spack, M.D.

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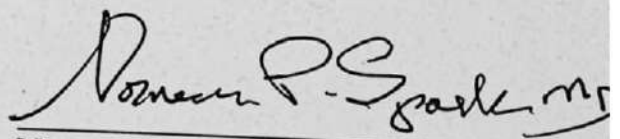
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Norman P. Spack, M.D.